

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
(Asheville Division)**

HANNAH R. GREEN,)	
)	
Plaintiff,)	
)	
v.)	
)	Case No. 1:21-cv-00069-MOC-WCM
MOOG MUSIC, INC.,)	
)	
Defendant.)	
)	

**PLAINTIFF'S MOTION TO QUASH THIRD PARTY SUBPOENAS
AND FOR PROTECTIVE ORDER**

COMES NOW Plaintiff, Hannah R. Green, by and through counsel, and hereby moves this Court pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure for an Order to quash third party subpoenas and for a Protective Order concerning service of such subpoenas. Specifically, Plaintiff seeks an Order quashing four proposed subpoenas by Defendants on Plaintiff's former employers, each of which seeks her entire personnel records with those entities. Plaintiff also seeks a Protective Order directing that these proposed subpoenas not be served.

Counsel for Plaintiff has conferred with Defendant's counsel in a good-faith effort to resolve the issues set forth in this Motion.

In support of this Motion, Plaintiff relies upon the Memorandum of Law filed contemporaneously herewith, and Exhibits 1 (proposed subpoenas) and 2 (correspondence with defense counsel) attached thereto.

WHEREFORE, Plaintiff respectfully requests that the Court quash the proposed subpoenas and issue a Protective Order as outlined above.

Dated: March 11, 2022

Respectfully submitted.

/s/ Catharine E. Edwards

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CERTIFICATE OF SERVICE

I hereby certify that on March 11, 2022, I electronically filed on behalf of the Plaintiff the foregoing **PLAINTIFF'S MOTION TO QUASH THIRD PARTY SUBPOENAS AND FOR PROTECTIVE ORDER** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel who have entered an appearance in this matter.

This the 11th day of March, 2022.

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